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ANDREW G. HALEY (1904-1966)
MICHAEL H. BADER
WILLIAM J. POTTS, JR.
HENRY A. SOLOMON
WILLIAM J. BYRNES
HARD M. RIEHL
J. WELLS KING
J. M. PELKEY
W. SHUBERT
JOHN CRIGLER

KENNETH A. COX
COUNSEL

LAW OFFICES
HALEY, BADER & POTTS
SUITE 600
2000 M STREET, N.W.
WASHINGTON, D. C. 20036-4574
202-331-0606

THEODORE D. KRAMER
MELODIE A. VIRTUE
JAMES E. DUNSTAN
MARY PRICE TAYLOR
KATHLEEN VICTORY

LARRY D. SUMMERVILLE
BROADCAST ANALYST

TELECOPIER
202-296-8679

November 18, 1987

RECEIVED

Mr. William J. Tricarico
Secretary
Federal Communications Commission
Washington, D.C. 20554

NOV 18 1987

Federal Communications Commission
Office of the Secretary

Dear Mr. Tricarico:

Transmitted herewith on behalf of Meredith Corporation
is an original and nine copies of the "Comments of Meredith
Corporation" in MM Docket No. 87-268.

Should further information be desired in this regard,
please communicate directly with this office.

Very truly yours,

Kathleen Victory
Kathleen Victory

KV:mb
Enclosures

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Federal Communications Commission
Office of the Secretary

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MM Docket 87-268

Advanced Television Systems and Their Impact on the Existing Television Broadcast Service

COMMENTS OF MEREDITH CORPORATION

The Meredith Corporation ("Meredith") hereby comments on the Commission's Notice of Inquiry on Advanced Television Systems, 2 FCC Rcd. 5125 (1987). Meredith, one of the original petitioners seeking Commission consideration, has been involved in this proceeding since its inception. Meredith wholeheartedly agrees with and supports the position taken by the Association of Maximum Service Telecasters ("MST") in its comments in this proceeding. Meredith, however, submits these comments in order to emphasize the factors which are essential to the continuing process of development and evaluation of advanced television ("ATV") systems.

The development of high development television ("HDTV") and other ATV systems and their potential impact on the continued viability and availability of local television broadcast systems which provide free, universal local

broadcast service mandates full and comprehensive testing and evaluation of these new and developing technologies. In fact, a major industry effort is currently under way rapidly yet thoroughly to develop, test and evaluate this new technology in order to resolve the issues raised by the Notice of Inquiry.

The issues raised by the Notice of Inquiry are interrelated and must be considered together in order to obtain accurate resolutions to the inquiry as a whole. In particular, it is clear that a true evaluation of the spectrum requirements cannot be adequately conducted until additional system development is completed, performance and feasibility tests on individual ATV systems are taken and compared, interference protection criteria are developed for each system, general standards are established and costs of implementation are developed. Although these activities have begun, it will take at least two to three years before evaluation of these questions can be reached.

In the interim, there are a number of criteria which should be used by the Commission, and the industry generally, in the process of development and evaluation of advanced television systems.

First, recent developments indicate that ATV systems will require a band width wider than the 6 MHz

Channel currently authorized to local television broadcasters and that current NTSC system receivers will be technically incapable of receiving the ATV signal. Alternative non-broadcast services, such as cable, video disc, satellite and cassette, will be able to provide the new high-quality service by using existing facilities. As a result, local television broadcast stations will be held to a higher standard. If the local television broadcast station cannot provide high quality ATV services, it will be unable adequately to compete with other video services and risk becoming a second-class service. Broadcasters must have the opportunity to implement an ATV system comparable to, or competitive with, the services which will be made available in the near future by alternative transmission services. The ATV systems currently being developed reflect needed improvements in horizontal and vertical resolution, picture sharpness and color fidelity, aspect ratio, high quality motion reproduction and compact disc quality sound.

Second, development of technology comparable with existing NTSC receivers and channels is an essential consideration in evaluating any ATV system. Absent such compatibility, the NTSC receivers will be rendered obsolete and the American consumers will face the loss of their \$80 billion investment in such receivers. Compatibility with the existing 6 MHz channels authorized to local television

broadcasters without altering the current frequency allocation system is equally as important from the perspective of the local television broadcasters facing the demise or substantial degradation of the quality of the service they provide in relation to the new services becoming available. NTSC Receiver and Channel compatibility should be sacrificed only if doing so would effectively allow the development and implementation of a local broadcast ATV system comparable in quality to service available from non-broadcast media.

Furthermore, inter-service compatibility is an important objective in ATV evaluation. Under the current NTSC system this type of compatibility has led to increased competition and a reduction in the cost of obtaining programming. For example, cable systems rely on local broadcast signals and programming for their services. With the new ATV systems, the alternative services, available to the public only on a pay basis, have the capacity to provide these advanced services where broadcasters currently do not. The cost of conversion devices alone -- allowing broadcasters to provide ATV Service -- would mean a deprivation of service to some currently served consumers unable to afford the cost of such devices. Conversion devices could also cause a potential reduction in quality of programming and obstructions to carriage generally. Thus,

inter-service compatibility would allow broadcast and non-broadcast services to continue to provide consumers with the quantity and scope of programming available with the NTSC system.

Third, consideration at this time of the subsidiary issues raised in the Notice of Inquiry, e.g., modification of the NTSC standard, establishment of a standard for ATV compatibility, the continued viability of UHF taboos, trading of interference rights and spectrum requirements, would be premature and ineffective. In order for evaluation of these issues to be productive, their consideration must be delayed pending development and evaluation of individual ATV systems and their characteristics, since resolution of these subsidiary issues will turn on the specific characteristics of the systems developed.

Thus, Meredith Corporation strongly supports the position of the Association of Maximum Service Telecasters as set forth in its comments in this proceeding and urges the Commission to consider the factors raised by MST and emphasized herein in its analysis and evaluation with regard to ATV systems and to refrain from any final analysis pending the outcome of the current industry-wide investigation and development of potentially viable ATV systems which can be broadcast on currently authorized 6 MHz

channels and which are compatible with existing NTSC receivers. Premature development of a final FCC position could preclude local broadcasters from the opportunity to implement competitive ATV systems which would, in turn, cause wide spread harm to local broadcasters and the American consumer.

Respectfully submitted,

MEREDITH CORPORATION

By Kathleen Victory
Michael H. Bader
John Wells King
Kathleen Victory

Haley, Bader & Potts
2000 M Street, N.W.
Suite 600
Washington, D.C. 20036
(202) 331-0606

Its Attorneys

November 18, 1987

CERTIFICATE OF SERVICE

I, Marilyn E. Blizzard, a secretary in the law firm of Haley Bader & Potts, hereby certify that a copy of the foregoing "COMMENTS OF MEREDITH CORPORATION" was mailed, postage prepaid this 18th day of November, 1987 to the following:

Jonathan D. Blake, Esquire
Gregory M. Schmidt, Esquire
Michael E. Tankersley, Esquire
Covington & Burling
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044
Counsel for the Association of
of Maximum Service Telecasters,
CBS Television Network Affiliates
Associates, Midwest Television, Inc.,
Spartan Radiocasting Company and WPSD-TV

Henry L. Baumann
Senior Vice President
and General Counsel
National Association of Broadcasters
1771 N Street, N.W.
Washington, D.C. 20036

J. Laurent Scharff, Esquire
James M. Smith, Esquire
Pierson, Ball & Dowd
1200 - 18th Street, N.W.
Washington, D.C. 20036
Counsel for Association of
Independent Television Stations, Inc. and
Gaylord Broadcasting, Inc.

Marvin J. Diamond, Esquire
Hogan & Hartson
555 - 13th Street, N.W.
Washington, D.C. 20004-1109
Counsel for Allbritton
Communications Co. and Telemunado Group, Inc.

Wade H. Hargrove, Esquire
Tharrington, Smith & Hargrove
P.O. Box 1151
209 Lafayette Street Mall
Raleigh, North Carolina 27602
Counsel for ABC Television Network
Affiliates Association

Robert A. Beizer, Esquire
Schnader, Harrison, Segal
& Lewis
1111 19th Street, N.W.
Washington, D.C. 20036
Counsel for American Family
Corporation and Tribune Broadcasting Company

Michael J. McCarthy, Esquire
Senior Vice President
and General Counsel
A.H. Belo Corporation
400 South Record
Dallas, Texas 75202

George H. Shapiro, Esquire
Arent, Fox, Kintner, Plotkin
& Kahn
1050 Connecticut Avenue, N.W.
Suite 600
Washington, D.C. 20036
Counsel for Camellia City
Telecasters, Inc. and Columbia River Television, Inc.

Robert W. Barker, Esquire
Kenneth E. Satten, Esquire
Wilkinson, Barker, Knauer & Quinn
1735 New York Avenue, N.W.
Washington, D.C. 20006
Counsel for Bonneville International
Corporation

Joel Rosenbloom, Esquire
John Payton, Esquire
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, D.C. 20037
Counsel for Capital Cities/ABC Inc.

James P. Riley, Esquire
Fletcher, Heald & Hildreth
1225 Connecticut Avenue, N.W.
Suite 400
Washington, D.C. 20036
Counsel for Chronicle Broadcasting Co.

John A. Rafter, Esquire
Werner S. Hartenberger, Esquire
John S. Logan, Esquire
Dow, Lohnes, Albertson
1255 - 23rd Street, N.W.
Washington, D.C. 20037
Counsel for Cosmos Broadcasting
Corporation, Cox Communications, Inc.
H&C Communications, Inc., Multimedia, Inc.
and NBC Television Network Affiliates Association

Alice F. Gustafson, Esquire
Graham & Dunn
Rainier Bank Tower
1301 Fifth Avenue
Seattle, Washington 98101
Counsel for Fisher Broadcasting Inc.

Steven A. Lerman, Esquire
Leventhal, Senter & Lerman
2000 K Street, N.W.
Suite 600
Washington, D.C.
Counsel for Educational Broadcasting
Corporation, Shamrock Broadcasting, Inc.
and Ralph C. Wilson Industries, Inc.

Thomas R. Herwitz
Vice President
Corporate & Legal Affairs
Fox Television Station, Inc.
5151 Wisconsin Avenue, N.W.
Washington, D.C. 20016

Peter D. O'Connell, Esquire
Pierson, Ball & Dowd
1000 Ring Building
1200 - 18th Street, N.W.
Washington, D.C. 20037
Counsel for Gannett Co, Inc.

Michael H. Rosenbloom, Esquire
Wilner & Scheiner
1200 New Hampshire Ave., N.W.
Suite 300
Washington, D.C. 20036
Counsel for Gateway Communications, Inc.

Vincent A. Pepper, Esquire
Pepper & Corazzini
1776 K Street, N.W.
Washington, D.C. 20006
Counsel for Gillett Communications
Company

Gerald E. Udwin
Vice President
Stephen A. Hildebrandt
Senior Counsel
Westinghouse Broadcasting Company, Inc.
1025 Connecticut Avenue, N.W.
Suite 506
Washington, D.C. 20036

Reed Miller, Esquire
Arnold & Porter
1200 New Hampshire Avenue, N.W.
Washington, D.C. 20036
Counsel for Harte-Hanks Communications, Inc.

Tom W. Davidson
Sidley & Ausin
1722 Eye Street, N.W.
Washington, D.C. 20006
Counsel for Heritage Communication Inc.

Mickey L. Hooten
Vice President and General
Manager of Television
The Hearst Corporation
959 Eighth Avenue
New York, New York 10019

Marvin Rosenberg, Esquire
Edward W. Hummers, Jr., Esquire
Fletcher, Heald & Hildreth
1225 Connecticut Avenue, N.W.
Suite 400
Washington, D.C. 20026
Counsel for King Broadcasting Co. and
Nationwide Communications, Inc.

Daniel K. McAlister
Senior Vice President
and General Counsel
Jefferson-Pilot
Communications Company
1 Julian Price Place
Charlotte, N.C. 28208

Daniel Marcus, Esquire
Howard B. Homonoff, Esquire
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, D.C. 20037
Counsel for Knight-Ridder Broadcasting Inc.

William S. Green, Esquire
Pierson, Ball & Dowd
1220 - 18th Street, N.W.
Washington, D.C. 20036
Counsel for Lee Enterprises, Inc.

Bruce Eisen, Esquire
Kaye, Scholer, Fierman,
Hayes & Handler
1575 Eye Street, N.W.
Washington, D.C. 20005
Counsel for Malrite Communications Group

Arthur B. Goodkind, Esquire
Koteen & Naftalin
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036
Counsel for McGraw-Hill
Broadcasting Company, Inc., The New York Times
Broadcast Group and Taft Broadcasting Company

Howard Monderer, Vice President
for Law/Washington
Molly Pauker, General Attorney
National Broadcasting Company, Inc.
1825 K Street, N.W., Suite 807
Washington, D.C. 20006

Gerald Scher, Esquire
Sundlun, Scher & Singer
1331 Pennsylvania Avenue, N.W.
Suite 460
Washington, D.C. 20004
Counsel for Outlet Communications, Inc.

Alan C. Campbell, Esquire
Dow, Lohnes & Albertson
1255 23rd Street, N.W.
Washington, D.C. 20037
Counsel for The Providence
Journal Company

L. Stanley Paige
Vice President for
Legal Affairs
Post-Newsweek Stations, Inc.
1150 15th Street, N.W.
Washington, D.C. 20071

Erwin G. Krasnow, Esquire
Verner, Liipfert, Bernhard,
McPherson & Hand
1660 L Street, N.W.
Suite 1000
Washington, D.C. 20036
Counsel for Pulitzer Broadcasting
Company

Brian M. Madden, Esquire
Cohn & Marks
1333 New Hampshire Avenue, N.W.
Suite 600
Washington, D.C. 20036
Counsel for Sarkes Tarzian, Inc.

Donald P. Zeifang, Esquire
Kenneth C. Howard, Jr., Esquire
Baker & Hostetler
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036
Counsel for Scripps-Howard
Broadcasting, Inc.

Norman P. Leventhal, Esquire
Leventhal, Senter & Lerman
2000 K Street, N.W.
Suite 600
Washington, D.C. 20006-1809
Counsel for Spanish International
Communications Corp.

Warren C. Zwicky
Vice President and
Washington Counsel
Storer Communications, Inc.
1155 Connecticut Avenue, N.W.
Suite 900
Washington, D.C. 20036

David R. Anderson, Esquire
Timothy N. Black, Esquire
Wilmer, Cutler & Pickering
2445 M Street, N.W.
Washington, D.C. 20037
Counsel for Times Mirror
Broadcasting Company

Eric A. Brass
Corporate Counsel
WGBH Educational Foundation
125 Western Avenue
Boston, Massachusetts 02134


Marilyn E. Blizzard

Re: [illegible]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]